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10 Attorneys for Defendant  
11 MERRILL LYNCH, PIERCE, FENNER & SMITH  
12 INCORPORATED

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 HECTOR MALDONADO,

17 Plaintiff,

18 vs.

19 MERRILL LYNCH, PIERCE, FENNER &  
20 SMITH INCORPORATED AND DOES 1-  
21 10,

22 Defendant.

CASE NO. C-05-01644-MMC

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING DISCOVERY  
CUT-OFF DATES AND DEADLINE FOR  
DISPOSITIVE MOTIONS ; ORDER  
GRANTING STIPULATION IN PART**

**The Honorable Maxine M. Chesney**

23 WHEREAS, the Court has set a trial date and initial case management deadlines  
24 for this matter;

25 WHEREAS, Anne M. Voigts was the primary attorney assigned to this matter at  
26 Munger, Tolles & Olson LLP, the law firm representing Defendant Merrill Lynch, Pierce, Fenner  
27 & Smith Incorporated;

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1 WHEREAS, lead trial counsel for Plaintiff Hector Maldonado will be in trial in  
2 late November and early December 2005, requiring postponement of depositions until after that  
3 trial has concluded;

4 WHEREAS, lead trial counsel for Defendant Merrill Lynch, Pierce, Fenner &  
5 Smith Incorporated will be in arbitration in November 2005, also requiring postponement of  
6 depositions until after that arbitration has concluded;

7 WHEREAS, the parties have met and conferred on the continuance of the trial date  
8 and all associated case management deadlines and stipulate to the entry of an order to the  
9 following effect through their counsel of record:

10 IT IS HEREBY STIPULATED that (1) the parties will conclude non-expert  
11 discovery on February 23, 2006; (2) the parties will conclude expert discovery on March 24,  
12 2006; and (3) dispositive motions shall be filed no later than April 7, 2006. The trial date and all  
13 other case management deadlines will remain as currently scheduled.

14  
15 Respectfully submitted,

16 DATED: October 25, 2005

SUNDEEN SALINAS AND PYLE  
ROBERT SALINAS  
PAMELA KONG

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19 By: 

ROBERT SALINAS

20 Attorneys for Plaintiff  
21 HECTOR MALDONADO  
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2 DATED: October 25, 2005

MUNGER, TOLLES & OLSON LLP  
TERRY E. SANCHEZ  
AILS A W. CHANG

3  
4 By: Terry E. Sanchez / aux  
5 TERRY E. SANCHEZ

6 Attorneys for Defendants  
7 MERRILL LYNCH, PIERCE, FENNER &  
8 SMITH INCORPORATED  
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**ORDER OF THE COURT**

IT IS HEREBY ORDERED that:

(1) The parties will conclude non-expert discovery on February 23, 2006.

(2) The parties will conclude expert discovery on March 24, 2006.

(3) Dispositive motions shall be filed no later than March 10, 2006.

Dated: October 25, 2005

  
The Honorable Maxine M. Cheney